

Exhibit 2

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17 Bitmain Technologies, Ltd.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

1 GOR GEVORKYAN, on behalf of
2 himself and all others similarly situated,
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4 Plaintiff,
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6 v.
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8 BITMAIN, INC., BITMAIN
9 TECHNOLOGIES, LTD. and DOES 1
10 to 10,
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12 Defendants.

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Case No. 3:18-cv-07004-JD
DEFENDANT BITMAIN TECHNOLOGIES, LTD.'S NOTICE OF DEPOSITION OF GOR GEVORKYAN AND REQUESTS FOR PRODUCTION OF DOCUMENTS

Date: March 5, 2020
Time: 9:00 a.m.
Place: O'Melveny & Myers, LLP
400 South Hope St.
18th Floor
Los Angeles, CA 90071

ATTACHMENT A

REQUEST FOR PRODUCTION NO. 1:

Documents that Refer, Relate to, or Discuss Your purchases of the Devices that are the subject of this Action.

REQUEST FOR PRODUCTION NO. 2:

Documents that evidence Your purchase of the Devices that are the subject of this Action, including any purchase receipts, invoices, emails, email confirmations, order forms, credit card statements, canceled checks, and bank statements.

REQUEST FOR PRODUCTION NO. 3:

Communications between You and any Person, including Bitmain, Bitmain employees, or third parties, that Refer, Relate to, or Discuss Your purchases of the Devices that are the subject of this Action.

REQUEST FOR PRODUCTION NO. 4:

Communications between You and Bitmain or between You and any company that You believe to be a Bitmain-related entity.

REQUEST FOR PRODUCTION NO. 5:

Communications between You and anyone at the San Jose, California office that You refer to in Your Opposition. (ECF No. 37 at 1-2, 5-7, 9, 11-13, 15.)

REQUEST FOR PRODUCTION NO. 6:

Documents that support Your statement in paragraph 2 of Your Declaration that You have been “at all times relevant to this action . . . a citizen of Burbank, California.” (ECF No. 37-1 ¶ 2.)

REQUEST FOR PRODUCTION NO. 7:

Documents that support Your statement in paragraph 5 of Your Declaration that You “made the purchases of all of the mining devices from Burbank, California.” (ECF No. 37-1 ¶ 5.)

REQUEST FOR PRODUCTION NO. 8:

Documents that support Your statement in paragraph 13 of Your Declaration that You visited “Bitmain’s website” and found and called a “standard United States phone number” to discuss Your Devices with customer service representatives. (ECF No. 37-1 ¶ 13.)

REQUEST FOR PRODUCTION NO. 9:

Documents You Identify in Your response to Interrogatory number 3 in Bitmain's First Set of Interrogatories to Plaintiff Gor Gevorkyan.

REQUEST FOR PRODUCTION NO. 10:

Documents You Identify in Your response to Interrogatory number 4 in Bitmain's First Set of Interrogatories to Plaintiff Gor Gevorkyan.

REQUEST FOR PRODUCTION NO. 11:

Documents You Identify in Your response to Interrogatory number 5 in Bitmain's First Set of Interrogatories to Plaintiff Gor Gevorkyan.

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1 Dated: January 21, 2020

2 /s/ Carlos M. Lazatin

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